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IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PLASTIC SURGERY INSTITUTE OF
UTAH, INC.; MICHAEL KIRK MOORE JR.;
KARI DEE BURGOYNE; KRISTIN
JACKSON ANDERSEN; AND SANDRA
FLORES,

Defendants.

Case No. 2:23-cr-00010-HCN

UNITED STATES' RESPONSE TO
DEFENDANT MICHAEL KIRK
MOORE JR.'S MOTION TO
CONTINUE TRIAL

Judge Howard C. Nielson, Jr.
Magistrate Judge Jared C. Bennett

Based on the representations in Defendant Michael Kirk Moore Jr.'s Motion to Continue Trial (Dkt 49), the United States of America concedes that Defendant Moore has shown cause to continue the trial based on the ends of justice under 18 U.S.C. §§ 3161(h)(7)(B)(i), (ii) and (iv).

Therefore, the United States does not oppose the motion.

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However, the United States believes that there is no cause to extend any trial continuance beyond November 2023.

DATED this 7th day of March, 2023.

TRINA A. HIGGINS
United States Attorney

/s/Todd C. Bouton
TODD C. BOUTON
Assistant United States Attorney